

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

DIANA FRICK and JOSEPH FRICK, her husband, CASE NO. 2:15-cv-00360-DSC

Plaintiffs, Honorable David Stewart Cercone

vs.

BIG LOTS STORES, INC.,

Defendant,

vs.

BUREAU VERITAS CONSUMER  
PRODUCTS SERVICES, INC.; BUREAU  
VERITAS CONSUMER PRODUCTS  
SERVICES (INDIA) PVT. LTD.;  
DESIGNCO OVERSEAS PRIVATE  
LIMITED a/k/a DESIGNCO INDIA d/b/a  
DESIGNCO; AND HOC INDUSTRIES,  
INC. f/k/a THE HOME OIL COMPANY  
f/k/a THE HOME OIL COMPANY, INC.  
d/b/a HOMESTAR,

Third-Party Defendants.

**BIG LOTS STORES INC.'S MOTION FOR LEAVE TO CONDUCT JURISDICTIONAL  
DISCOVERY AS TO THIRD-PARTY DEFENDANT DESIGNCO OVERSEAS PRIVATE  
LIMITED A/K/A DESIGNCO INDIA D/B/A DESIGNCO**

Defendant and Third-Party Plaintiff Big Lots Stores, Inc. ("Big Lots") by and through its undersigned counsel, Jason G. Wehrle, Esquire, MINTZER SAROWITZ ZERIS LEDVA & MEYERS, LLP, Zach Mayer, Esquire, Sara J. Krumholz, Esquire and KANE RUSSELL COLEMAN & LOGAN, P.C. file this Motion for Leave to Conduct Jurisdictional Discovery as to Third Party Defendant Designco Overseas Private Limited a/k/a Designco India d/b/a Designco ("Designco"), requesting jurisdictional discovery prior to the Court ruling on

Designco's pending Motion to Dismiss for Lack of Personal Jurisdiction. Big Lots' motion is

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**BIG LOTS' MOTION FOR LEAVE TO CONDUCT  
JURISDICTIONAL DISCOVERY** – Page 1

supported by the accompanying Brief in Support of Big Lots' Motion for Leave to Conduct Jurisdictional Discovery and the exhibits attached to same. Big Lots' provides a proposed order pursuant to L. Cv. R. 7.D.

Respectfully submitted on October 12, 2016:

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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on the 12<sup>th</sup> day of October, 2016, a true and correct copy of this **MOTION FOR LEAVE TO CONDUCT JURISDICTIONAL DISCOVERY AS TO THIRD-PARTY DEFENDANT DESIGNCO OVERSEAS PRIVATE LIMITED A/K/A DESIGNCO INDIA D/B/A DESIGNCO** was provided to the parties via the Court's ECF System as follows:

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